

many pages were needed. ECF No. 109. Their motion was denied as moot in light of the Court's previous order allowing each defendant to file a response not to exceed twenty pages. *Id.*

4. Local Rule 7.0(f) limits reply suggestions to ten pages, "unless otherwise authorized by the Court."

5. Plaintiffs seek leave to file reply suggestions of twenty pages, exclusive of the table of contents, table of authorities, signature block, and certificate of service. The additional ten pages are necessary to respond to the multi-layered arguments presented in the separate suggestions in opposition to Plaintiffs' motion for class certification. Plaintiffs have endeavored to keep their reply concise while responding to each plausible point raised in the two separate twenty-page-each responses.

6. The Missouri Defendants consent to Plaintiffs' request.

7. Corizon consents only in part, explaining that "[c]onsistent with the Court's additional 5 pages it allowed defendants, we will consent to 15 pages."

8. Plaintiffs' request for an additional ten pages is the same number of additional pages allowed to Defendants' collectively. Moreover, unlike Defendants, Plaintiffs have indicated to this Court exactly how many additional pages they need rather than seeking carte blanche authorization to exceed the page limitations.

9. In accordance with Local Rule 15.1(a)(2), Plaintiffs attach their proposed reply. WHEREFORE Plaintiffs request this Court grant them leave to file their attached reply to Defendants' suggestions in opposition to Plaintiffs' motion for class certification.

Respectfully submitted,

/s/ Anthony E. Rothert

Anthony E. Rothert, #44827
Jessie Steffan, #64861
American Civil Liberties Union
of Missouri Foundation
906 Olive Street, Ste. 1130
St. Louis, Missouri 63108
Phone: 314/652-3114
Fax: 314/652-3112
trothert@aclu-mo.org
jsteffan@aclu-mo.org

Gillian R. Wilcox, #61278
American Civil Liberties Union
of Missouri Foundation
406 West 34th Street, Suite 420
Kansas City, Missouri 64111
Phone: (816) 470-9938
Facsimile: (314) 652-3112
gwilcox@alclu-mo.org

Mae C. Quinn, #61584
Amy E. Breihan, #65499
MACARTHUR JUSTICE CENTER AT ST. LOUIS
3115 South Grand Blvd., Suite 300
St. Louis, MO 63118
Phone: (314) 254-8540
Fax: (314) 254-8547
mae.quinn@macarthurjustice.org
amy.breihan@macarthurjustice.org

CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of March, 2017, a true and correct copy of the foregoing was electronically filed using the Court's online case filing system, which will send notice to all counsel of record.

/s/ Anthony E. Rothert